

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No.2659

**DECLARATION OF JACOB M. CROKE
IN SUPPORT OF DEBTORS' OBJECTION TO THE MOTION OF ISLAND AIR
CAPITAL AND PAUL F. ARANHA FOR RELIEF FROM THE AUTOMATIC STAY,
TO THE EXTENT APPLICABLE, AND RELATED RELIEF**

I, Jacob M. Croke, declare under penalty of perjury as follows:

1. I am a partner in the law firm of Sullivan & Cromwell LLP, counsel to the Debtors. I submit this declaration (the "Declaration") in support of *Debtors' Objection to the Motion of Island Air Capital and Paul F. Aranha for Relief from the Automatic Stay, to the Extent Applicable, and Related Relief* (the "Objection"),² filed concurrently herewith, to place before the Court certain documents and information referred to in the Objection.

2. Except as otherwise indicated, all facts set forth in this Declaration are based upon information learned from my review of documents stored in the Debtors' document repository or obtained from counsel to former FTX Group personnel, or from information

¹ The last four digits of Alameda Research LLC's tax identification number is 4063. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

² Capitalized terms used but otherwise not defined shall have the meaning ascribed to them this Declaration or in the Objection.

supplied by persons working directly with me or under my supervision, direction or control and/or from the Debtors' professionals and advisors. If I were called upon to testify, I could and would testify competently to the facts set forth in this Declaration.

3. Attached hereto as **Exhibit A** are true and correct copies of a February 2022 email chain and its attachments, sent by Paul Aranha to a senior FTX Group executive.

4. Attached hereto as **Exhibit B** is a true and correct copy of a February 2, 2022 notification of a wire transfer of \$500,000 from a Silvergate Bank account ending #456 held in the name of Debtor Alameda Research Ltd. ("Alameda") to AIC Title Agency, LLC, the escrow agent for the Global.

5. Attached hereto as **Exhibit C** is a true and correct copy of a March 2, 2022 notification of a wire transfer of \$15,400,000 from a Silvergate Bank account ending #738 held in the name of Debtor North Dimension Inc. to AIC Title Agency, LLC, the escrow agent for the Global.

6. Attached hereto as **Exhibit D** is a true and correct copy of an executed term sheet dated March 16, 2022, signed by Trans Island Airways Group ("TIA"), Paul Aranha, and FTX Ventures.

7. Attached hereto as **Exhibit E** is a true and correct copy of an August 16, 2022 notification of a wire transfer of \$11,545,000 from a Silvergate Bank account ending #456 held in the name of Debtor Alameda to Aerotitle, the escrow agent for the Legacy.

8. Attached hereto as **Exhibit F** are true and correct copies of certain invoices sent by Paul Aranha, on behalf of TIA, to a senior FTX Group executive related to, among other things, expenses for renovations of the Planes.

9. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 5, 2023
New York, New York

By: /s/ Jacob M. Croke
Jacob M. Croke
Sullivan & Cromwell LLP